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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

Michael Daniels ,	)	Case No. 4:24-cv-09445-HSG
Plaintiff,	)	STIPULATION AND ORDER
vs.	)	FOR EXTENSION OF TIME
Frank Bisignano,	)	
COMMISSIONER OF SOCIAL	)	
SECURITY <sup>1</sup> ,	)	
Defendant.	)	

Pending the Court's approval, IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 3-day extension of time, from May 27, 2025 to

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<sup>1</sup> Frank Bisignano became the Acting Commissioner of Social Security on May 6, 2025. Pursuant to Rule 25(d) of the Federal Rules of Civil Procedure, Frank Bisignano should be substituted for Leland Dudek as the defendant in this suit. No further action need be taken to continue this suit by reason of the last sentence of section 205(g) of the Social Security Act, 42 U.S.C. § 405(g).

May 30, 2025, for Plaintiff to serve on defendant with PLAINTIFF'S BRIEF. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's second request for an extension of time. Plaintiff respectfully states that the requested extension is necessary due several merit briefs being due on the same week. For the week of May 26, 2025, Plaintiff's Counsel has four merit briefs, one reply brief, and two EAJA Stipulations due. The case has recently been assigned to Counsel. Counsel requires additional time to brief the issues thoroughly for the Court's consideration. Defendant does not oppose the requested extension. Counsel apologizes to the Defendant and Court for any inconvenience this may cause.

Respectfully submitted,

Dated: May 22, 2025

PENA & BROMBERG, ATTORNEYS AT LAW

By: /s/ Dolly M. Trompeter  
DOLLY M. TROMPETER  
Attorneys for Plaintiff

Dated: May 22, 2025


PATRICK D. ROBBINS  
Acting United States Attorney  
MATHEW W. PILE  
Associate General Counsel  
Office of Program Litigation  
Social Security Administration

By: \*/s/ Erin Highland  
Erin Highland  
Special Assistant United States Attorney  
Attorneys for Defendant  
(\*As authorized by email on May 22, 2025)

**ORDER**

Pursuant to stipulation, IT IS SO ORDERED.

Dated: 5/23/2025

  
HON. HAYWOOD S. GILLIAM, JR.  
UNITED STATES DISTRICT JUDGE